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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CARLOS ALBERTO RODRIGUES  
DE FREITAS as the Administrator of  
the Estate of Isabel Auler ( deceased),  
CARLOS ALBERTO RODRIGUES  
DE FREITAS an individual.

Plaintiffs,

vs.

THE HERTZ CORPORATION, a  
Delaware corporation, ROBERT  
CHARLES STEVENS, an individual,  
and DOES 1- 10 inclusive  
Defendants,

**Case No.: 2: 18-cv-01522 -JAD-  
BNW**

**STIPULATION AND [PROPOSED]  
ORDER ALLOWING PLAINTIFF TO  
FILE THIRD AMENDED COMPLAINT  
FOR DAMAGES**

**STIPULATION AND [PROPOSED] ORDER ALLOWING PLAINTIFF TO FILE  
THIRD AMENDED COMPLAINT FOR DAMAGES**

WHEREAS on or about October 7, 2021, Plaintiffs (“Plaintiffs”) filed  
their Second Amended Complaint for damages against Defendants in this action

WHEREAS Plaintiffs seeks to file their Third Amended Complaint for Damages, which only adds sixth and seventh causes of action for Wrongful Death (NRS 41.085) based upon the death of former Plaintiff Isabel Auler.

WHEREAS in lieu of Plaintiffs filing a motion to make a motion per, inter alia, FRCP 15 the parties have agreed to permit Plaintiffs to file a Third Amended Complaint.

WHEREAS a copy of Plaintiffs proposed Third Amended Complaint for Damages is attached hereto as Exhibit "A."

IT IS HEREBY STIPULATED, by and between Plaintiffs and Defendant HERTZ CORPORATION, by and thru their counsel that,

1. Plaintiffs should be granted leave to amend to file their Third Amended Complaint for Damages, a copy of which is attached hereto as Exhibit "A."
2. Defendant's responsive pleading shall be due thirty (14) days after the Second Amended Complaint for Damages is filed.

DATED: October 5, 2021.

**Order**

IT IS ORDERED that ECF No. 116 is GRANTED. IT IS FURTHER ORDERED that the Clerk of Court shall detach ECF No. 116-1 and separately file it on the docket.

IT IS SO ORDERED

DATED: 8:46 am, October 20, 2021



BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE

/s/ Jonathan C. Capp  
JONATHAN C. CAPP ESQ.  
LAW OFFICES OF JONATHAN C. CAPP  
Attorney for Plaintiffs  
Kevin Lazar

/s/ KEVIN LAZAR ESQ.  
= FORD WALKER. HAGGERTY & BEHAR  
Attorney for Defendant HERTZ CORPORATION

/s/ James E. Murphy  
JAMES E. MURPHY ESQ.  
LEWIS BRISBOIS BISGAARD & SMITH LLP  
Attorney for Defendant HERTZ CORPORATION